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AMBU A/S, AMBU INC., AMBU LTD., and AMBU SDN. BHD.

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF CALIFORNIA**

THE LARYNGEAL MASK COMPANY LTD. and LMA NORTH AMERICA, INC.,)	Civil Action No. 07 CV 1988 DMS (NLS)
Plaintiffs,)	JOINT MOTION FOR EXTENSION OF
v.)	TIME TO FILE RESPONSIVE CLAIM
AMBU A/S, AMBU INC., AMBU LTD., and AMBU SDN. BHD.,)	CONSTRUCTION BRIEFING AND
Defendants.)	RELATED DISCOVERY
AND RELATED COUNTERCLAIMS)	Honorable Dana M. Sabraw
)	

1 In view of the Court's Order of December 10, 2008 Denying Plaintiffs' Motion to
2 Strike [Doc. # 97], Plaintiffs The Laryngeal Mask Company Ltd. and LMA North America,
3 Inc. (collectively "LMA") and Defendants/Counterclaimants AMBU A/S, AMBU INC.,
4 AMBU LTD., and AMBU SDN. BHD. (collectively "AMBU") have conferred regarding
5 scheduling issues and hereby jointly move the Court for an order extending the due date for
6 their responsive claim construction briefing (currently set for December 19, 2008) to
7 Wednesday, January 14, 2009 in order to complete document and deposition discovery
8 related to AMBU's identification of Samsun Lampotang, Ph.D. as an expert witness
9 regarding claim construction. The date of the claim construction hearing in this matter is
10 Monday, January 26, 2009 and shall remain unaffected by this Joint Motion.

11 Accordingly, LMA and AMBU hereby agree and stipulate to a court order as follows:

12 1. AMBU and Dr. Lampotang shall produce any and all documents and things
13 responsive to LMA's pending subpoena of Dr. Lampotang served on October 10, 2008 by
14 close of business on December 23, 2008;

15 2. AMBU and Dr. Lampotang shall serve upon LMA any responsive or reply
16 declaration of Dr. Lampotang in connection with the claim construction in this case by close
17 of business on December 19, 2008, and AMBU will not file, without prior leave of the Court,
18 any additional, revised or supplemental declarations of Dr. Lampotang regarding claim
19 construction after December 19;

20 3. Dr. Lampotang shall be made available for a deposition by LMA no later than
21 Friday, January 9, 2009;

22 4. The parties' responsive claim construction briefs shall be filed and served no
23 later than Wednesday, January 14, 2009; and

24 5. The claim construction hearing remains on calendar on Monday, January 26,
25 2009.

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Respectfully submitted,
KNOBBE, MARTENS, OLSON & BEAR, LLP

Dated: December 16, 2008

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Dated: December 16, 2008

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Dated: December 16, 2008

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